

1 PHILLIP A. TALBERT
United States Attorney
2 KAREN A. ESCOBAR
Assistant United States Attorney
3 2500 Tulare Street, Suite 4401
Fresno, CA 93721
4 Telephone: (559) 497-4000
Facsimile: (559) 497-4099
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6 Attorneys for Plaintiff
United States of America
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8 IN THE UNITED STATES DISTRICT COURT
9
EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

CASE NO. 5:24-MJ-00006-CDB

11 Plaintiff,

12
STIPULATION RE TREATMENT OF
PROTECTED INFORMATION

13 v.

14 KRISTOPHER THOMAS,
JUSTIN DAMONTE MITCHELL, and
NATASHA MICHELLE BAILEY,
15

16 Defendants.
17

18 WHEREAS, the discovery in this case contains a large amount of other people's personal
19 identifying information, including personal identification numbers, dates of birth, financial account
20 numbers, telephone numbers, and residential addresses ("Protected Information"); and

21 WHEREAS, the parties desire to avoid the necessity of large-scale redactions and the
22 unauthorized disclosure of Protected Information to anyone not a party to this case;

23 The parties agree that entry of a stipulated protective order is appropriate.

24 THEREFORE, the parties stipulate as follows:

25 1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of
26 Criminal Procedure and its general supervisory authority that pertains to all discovery produced to the
27 defendants' counsel in this case;
28

1 2. By signing this stipulation, defense counsel agree not to share any discovery that contains
2 Protected Information with anyone other than defense counsel and defense counsel investigators and
3 support staff. Defense counsel may permit the defendants to review unredacted discovery that contains
4 Protected Information in the presence of defense counsel or defense counsel investigators and support
5 staff. But defense counsel shall not allow the defendants to copy the Protected Information and may
6 only provide the defendants with copies of discovery from which the Protected Information is redacted;

7 3. The discovery may be used only in connection with the litigation of this case. The
8 discovery is now and will remain the property of the government. Defense counsel will return the
9 discovery to the government, or certify that it has been destroyed, at the conclusion of the case;

10 4. Defense counsel will store the discovery in a secure place and will use reasonable care to
11 ensure that it is not disclosed to third persons in violation of this agreement; and

12 5. In the event that the defendants substitute counsel, undersigned defense counsel agree to
13 withhold discovery from the new defense counsel until the new defense counsel agree to be bound by
14 this stipulation and resulting order.

15 IT IS SO STIPULATED.

16 DATED: March 5, 2024

/s/ Peter Jones

Peter Jones
Counsel for Kristopher Thomas

18 DATED: March 5, 2024

/s/ Monica Bermudez

Monica Bermudez
Counsel for Justin Damonte Mitchell

21 DATED: March 5, 2024

/s/ Alekxia Torres-Stallings

Alekxia Torres-Stallings
Counsel for Natasha Michelle Bailey

24 DATED: March 5, 2024

/s/ Karen A. Escobar

Joseph Barton
Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

KRISTOPHER THOMAS,
JUSTIN DAMONTE MITCHELL, and
NATASHA MICHELLE BAILEY,

Defendants.

CASE NO. 5:24-MJ-00006-CDB

**ORDER RE TREATMENT OF PROTECTED
INFORMATION**

For good cause shown, the stipulation between counsel, dated March 5, 2024, in the above case, regarding the treatment of protected information contained in the discovery is approved.

IT IS SO ORDERED.

Dated: March 5, 2024



UNITED STATES MAGISTRATE JUDGE